



STATE OF WASHINGTON

PUBLIC DISCLOSURE COMMISSION

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BEFORE THE PUBLIC DISCLOSURE COMMISSION  
OF THE STATE OF WASHINGTON

IN RE COMPLIANCE	)	PDC CASE NO: 06-302
WITH RCW 42.17	)	
	)	
Whatcom County Democratic Central	)	
Committee	)	
	)	
	)	REPORT OF INVESTIGATION
	)	
Respondent.	)	
_____	)	

I.  
BACKGROUND

- 1.1 The Whatcom County Democratic Central Committee (WCDCC) filed a Political Committee Registration (PDC Form C-1pc) on January 6, 2005, as a continuing political committee. The WCDCC is a Bona Fide political party organization under the full reporting option which requires them to file frequent and detailed reports of contribution and expenditure activities.
- 1.2 The C-1pc filed by WCDCC listed Barry Buchanan as the campaign manager, and Eugene "Gene" Hogan as the treasurer, and the Committee officers included Barry Buchanan, Chair, and Robin Bailey as the Vice-Chair. **(Exhibit 1)**
- 1.3 Effective February 8, 2006, Natalie McClendon has been elected as the new Treasurer for WCDCC.

II.  
ALLEGATIONS

- 2.1 A complaint was received by the Public Disclosure Commission (PDC) on January 3, 2006, from William McCallum of Bellingham, Washington. Mr. McCallum is a member of Whatcom Watch, a community forum for environmental and political issues. **(Exhibit 2)**



- 2.2 The complaint alleges that the Whatcom County Democratic Central Committee failed to timely file Summary, Full Report Receipts and Expenditures (PDC Form C-4) and Cash Receipts/Monetary Contributions Reports (PDC Form C-3) for activities undertaken during calendar year 2005. The complaint alleges violations of RCW 42.17.080 and .090.

### III. FINDINGS

- 3.1 The Whatcom County Democratic Central Committee (WCDCC) is a bona-fide political party organization operating in Whatcom County as designated by the Washington State Democratic Party.
- 3.2 On January 6, 2005, the WCDCC filed a C-1pc listing Barry Buchanan as Chairman, Robin Bailey as Vice Chairman, and Eugene "Gene" Hogan as Treasurer.
- 3.3 On January 6, 2006, PDC staff initiated a phone call to WCDCC treasurer Gene Hogan. Mr. Hogan stated that he was still the interim treasurer, but that he had resigned as of December 31, 2005. He said that when he took the job he had someone to help him with the reports, but that he lost that help shortly after starting. He said that he quickly realized this wasn't the job he had envisioned, that it involved a significant amount of data entry for the WEDS and Quicken systems, and that was something he was not prepared to do. He said that he was afraid to file C-4 reports because he might file them wrong, and that it was his fault for not mentioning to the WCDCC officers that he was having problems.  
**(Exhibit 3)**
- 3.4 On February 6, 2006, Gene Hogan was formally interviewed by PDC staff. He repeated the information set out above, again taking responsibility for the late filings and other problems of the WCDCC.
- 3.5 On February 3, 2006, Barry Buchanan was interviewed by telephone. He told PDC staff that the WCDCC reports would be up-to-date by February 3, 2006. The December 2005 C-4 was filed February 3, 2006. The WCDCC board has initiated a system to send a "PDF file" of each C-3 and C-4 report to the finance chair, the committee chair and vice-chair. Mr. Buchanan agreed with Mr. Hogan that the job of treasurer could be overwhelming at times and that he and the committee failed to assist Mr. Hogan. On February 8, 2006, Natalie McClendon was designated as the interim treasurer of the WCDCC until she can be formally appointed by the board of directors as the treasurer.
- 3.6 Mr. Buchanan identified WCDCC expenses and activities that: 1) were related to party building activities; 2) directly supported candidates or

ballot propositions; and 3) were not related to campaigns or ballot measures. He further identified campaign activities that were related to candidates for federal office, candidates for state and local office and ballot propositions, and other expenses. He said the expenses made by the WCDCC for mailings, door hangers, and other advertisements were "slate cards" that generally included just the name and position being sought by candidates. Mr. Buchanan stated the expenses that were disclosed for "grassroots printing and postage" refer to the WCDCC newsletter, which is a dedicated monthly newsletter that includes a calendar of events and issues. He said the newspaper does not usually feature candidates or ballot measures, but that closer to elections it may contain endorsements or a slate card of candidates. Mr. Buchanan said the WCDCC spends approximately 25% to 30% of its budget on get-out-the-vote (GOTV) materials close to an election.

### Summary of 2005 Reporting

- 3.7 In 2005, the WCDCC raised \$25,629, reporting the contributions on 91 C-3 reports that were between 18 and 157 days late. The WCDCC spent \$29,511, reporting the expenditures on 12 C-4 reports that were filed between 24 and 245 days late. Of the \$29,511 in expenditures, \$7,789 or 26.3%, were indirect campaign expenditures. \$606 or 2.05% were direct campaign expenditures.

#### Calendar Year 2005 C-3 Reports – All Filed Late (See Exhibit 4)

- 3.8 All C-3 reports were filed late for calendar year 2005. The following chart summarizes the late filed C-3 reports:

Month 2005	No. Reports	Days Late	Amount
January	9	95-138	\$ 2,130
February	6	110	\$ 810
March	9	78	\$ 1,066
April	9	49	\$ 830
May	5	18	\$ 462
June	8	21	\$ 2,617
July	3	150-157	\$ 80
August	8	134-148	\$ 1,459
September	10	104-124	\$ 4,685
October	10	80-101	\$ 7,205
November	5	63-77	\$ 382
December	9	21-24	\$ 3,903
<b>Total</b>	<b>91</b>	<b>18-157</b>	<b>\$ 25,629</b>



### **Details of C-3 Reporting**

- 3.9 **January C-3 Reports-** On May 16, 2005, the WCDCC filed two C-3 reports for contributions received during the month of January 2005. These reports were 95 days late. On June 28, 2005, WCDCC filed an additional seven C-3 reports for contributions received in January. Those reports were filed 138 days late. The nine January C-3 reports disclosed that the WCDCC received \$2,130 in contributions during the month of January 2005.
- 3.10 **February - May C-3 Reports** - On June 28, 2005, the WCDCC filed 30 C-3 reports for contributions received from February 2005 through May 2005. The C-3 reports were filed between 18 -110 days late, and disclosed \$3,168 in contributions.
- 3.11 **June C-3 Reports** - On August 1, 2005, the WCDCC filed eight C-3 reports for contributions received during June 2005. The C-3 reports were filed 21 days late, and disclosed \$2,617 in contributions.
- 3.12 **July C-3 Reports** - On December 22, 2005, the WCDCC filed three C-3 reports for contributions received during July 2005. The C-3 reports were filed between 150 – 157 days late, and disclosed \$80 in contributions.
- 3.13 **August C-3 Reports** - On December 27, 2005, the WCDCC filed two C-3 reports for contributions received during August 2005. The C-3 reports were filed between 134 – 141 days late, and disclosed \$107 in contributions. On December 29, 2005, the WCDCC filed one C-3 report for contributions received during a portion of August 2005. The C-3 report was filed 134 days late, and disclosed \$87 in contributions. On January 17, 2006, the WCDCC filed the remaining five C-3 reports for contributions received in August 2005. The C-3 reports were 141 – 148 days late, and disclosed \$1,265 in contributions.
- 3.14 **September C-3 Reports** - On January 11, 2006, the WCDCC filed one C-3 report for contributions received in September 2005. The C-3 report was 124 days late, and disclosed \$424 in contributions on September 9, 2005. On January 12, 2006, the WCDCC filed one C-3 report for contributions received in September 2005. The C-3 report was filed 104 days late, and disclosed \$75 in contributions. The remaining seven C-3 reports for September 2005 were filed on January 18, 2006. The C-3 reports were filed between 110-120 days late, and disclosed \$4,186 in contributions.
- 3.15 **October C-3 Reports** - On January 19, 2006, the WCDCC filed ten C-3 reports for contributions received in October, 2005. The C-3 reports were filed between 80 to 101 days late, and disclosed \$7,205 in contributions.



- 3.16 **November C-3 Reports** - On January 23, 2006, the WCDCC filed five C-3 reports for contributions received in November, 2005. The C-3 reports were filed between 63-77 days late, and disclosed \$382 in contributions.
- 3.17 **December C-3 Reports** - On January 30, 2006 and February 3, 2006, the WCDCC filed nine C-3 reports for contributions received during the month of December 2005. The C-3 reports were filed 21-24 days late, and disclosed \$3,903 in contributions.

**Calendar Year 2005 C-4 Reports - All Filed Late (See Exhibit 5)**

- 3.18 All C-4 reports were filed late for calendar year 2005. The following chart summarizes the late filed C-4 reports.

Month 2005	Due Date	Date Filed	Days Late	Contributions	Expenses
January	2-10-05	5-16-05	95	\$ 2,130	\$ 1,968
February	3-10-05	5-16-05	67	\$ 810	\$ 1,860
March	4-11-05	5-16-05	35	\$ 1,066	\$ 2,232
April	5-10-05	1-10-06	245	\$ 830	\$ 2,694
May	6-10-05	1-10-06	214	\$ 462	\$ 745
June	7-11-05	1-11-06	183	\$ 2,617	\$ 1,414
July	8-10-05	1-11-06	154	\$ 80	\$ 309
August	9-12-05	1-11-06	120	\$ 1,459	\$ 1,376
September	10-10-05	1-18-06	100	\$ 4,685	\$ 1,956
October*	11-10-05	1-23-06	74	\$ 7,205	\$ 7,885
November	12-10-05	1-23-06	42	\$ 382	\$ 3,351
December	1-10-06	2-3-06	24	\$ 3,903	\$ 3,721
<b>Total</b>			<b>24-245</b>	<b>\$ 25,629</b>	<b>\$ 29,511</b>

\* No 21-day or 7-day pre-general reports were filed as required.

**Details of 2005 C-4 Reports**

- 3.19 **January, February and March C-4 Reports** - On May 16, 2005, the WCDCC filed three C-4 (Summary, Full Report Receipts and Expenditures) reports for contribution and expenditure activities undertaken in January, February, and March 2005. The C-4 reports were filed between 35 and 95 days late, and disclosed \$4,006 in contributions and \$6,060 in expenditures. No other C-4 reports were filed for the calendar year 2005 until January of 2006.
- 3.20 **April and May C-4 Reports** - On January 10, 2006, the WCDCC filed two C-4 reports for contribution and expenditure activities undertaken in April and May 2005. The reports were 245 and 214 days late, and disclosed \$1,292 in contributions and \$3,439 in expenditures.

- 3.21 **June, July and August C-4 Reports** - On January 11, 2006, the WCDCC filed three C-4 reports for contribution and expenditure activity in June, July, and August 2005. The C-4 reports were filed 183, 154, and 120 days late, respectively, and disclosed \$4,156 in contributions and \$3,099 in expenditures.
- 3.22 **September C-4 Report** - On January 18, 2006, the WCDCC filed one C-4 report for contribution and expenditure activities undertaken in September 2005. The C-4 report was filed 100 days late, and disclosed \$4,685 in contributions and \$1,956 in expenditures.
- 3.23 **October and November C-4 Reports** - On January 23, 2006, the WCDCC filed two (2) C-4 reports for contribution and expenditure activities undertaken in October and November 2006. The C-4 reports were filed 74 and 42 days late, respectively, and disclosed \$7,587 in contributions and \$11,236 in expenditures. The 21-day and 7-day pre-general election C-4 reports were not filed by the WCDCC, as required for political committees participating in the 2005 election.
- 3.24 **December C-4 Report** - On February 3, 2006, the WCDCC filed one C-4 report for contribution and expenditure activities undertaken in December 2005. The C-4 report was filed 24 days late, and disclosed \$3,903 in contributions and \$3,721 in expenditures.
- 3.25 On January 27, 2006, PDC staff sent an electronic message to the WCDCC asking if they participated in the 2005 election. Mr. Buchanan wrote in his reply that "we did not directly sponsor any candidate or ballot measure in 2005 Primary or General Election. We did have a get out the vote campaign with a mailing and a newspaper ad".
- 3.26 On January 31, 2006, in a telephone conversation with Mr. Buchanan he corrected his statement and said that the WCDCC had purchased yard signs in support of Whatcom County Charter Amendment 1, a local ballot measure. **(Exhibits 6 and 7)**

#### **2005 Distribution of Expenses (See Exhibit 8)**

- 3.27 On the December 2005 C-4, the WCDCC disclosed making a total of \$29,511 in expenses for calendar year 2005. After interviewing Barry Buchanan about WCDCC expenses, it was determined that \$7,789 in WCDCC campaign expenditures featured candidates and ballot measures as part of a GOTV, slate card or party building effort. Those expenditures represented 26.3% percent of the funds spent by the WCDCC in 2005. \$606 in direct campaign expenditures listed on the November schedule A and reported February 3, 2006, was for yard signs in support of Whatcom



County Charter Amendment 1, and represented 2.05% of the funds spent by the WCDCC in 2005.

- 3.28 On February 10, 2006 PDC staff reviewed committee bank statements and WEDS computer data sets from the WCDCC. A review of this information identified several needed corrections for C-4 reports covering 2005 activities. The net corrections totaled minus \$26. **(Exhibit 9)**

### **Summary of 2004 Reporting**

- 3.29 During the course of the investigation, PDC staff also reviewed 2004 reporting. In 2004, the WCDCC raised \$66,719, reporting the contributions on 208 C-3 reports. Of these reports, 108 (52%) were filed 1-58 days late. The late filed C-3 reports amounted to \$36,567.

The WCDCC spent \$62,357, reporting the expenditures on 13 C-4 reports. Of these reports, 10 were filed 2-65 days late. The late filed C-4 reports totaled \$55,253 in contributions received and \$41,352 in expenditures. Of the \$41,352 in expenditures, \$13,128 (32%) were attributed to state or local related campaign expenditures, \$2,965 (7%) were attributed to the U.S. Presidential campaign, and \$25,259 (61%) were related to other committee expenses. There were no direct campaign expenditures during 2004.

- 3.30 The following chart summarizes late filed C-3 reports filed by the WCDCC for 2004: **(Exhibit 10)**

Month 2004	No. Reports	Days Late	Amount
January	7	47-50	\$2,648
February	15	31-37	\$10,392
March	9	24	\$1,762
April	32	7-46	\$10,147
July	3	8-12	\$185
August	19	1-9	\$2,722
September	7	2-9	\$2,997
October	8	1-15	\$3,929
November	3	31	\$89
December	5	59	\$1,696
<b>Total</b>	<b>108</b>	<b>1-58</b>	<b>\$36,567</b>

Of the late filed C-3 reports, 55 reports totaling \$15,373 were filed from 1 and 15 days late, 29 reports totaling \$16,111 were filed from 23-45 days late, and 24 reports totaling \$5,083 were filed from 45-58 days late. **(Exhibit 11)**

Number of C-3 Reports	Amount	Days Late
55	\$15,373	1-15
29	\$16,111	23-45
24	\$ 5,083	45-58
<b>Total – 108</b>	<b>\$36,567</b>	<b>1-58</b>

### Details of C-3 Reporting

#### Calendar Year 2004 Late Filed C-3 Reports (See Exhibit 10)

- 3.31 **January C-3 Reports** - On March 29, 2004 and April 1, 2004, the WCDCC filed 7 C-3 reports late for contributions received in January 2004. These C-3 reports were filed 47-50 days late, and disclosed \$2,648 in contributions.
- 3.32 **February C-3 Reports** - On April 10, 13, and 16, 2004, the WCDCC filed 15 C-3 reports late for contributions received in February 2004. These C-3 reports were filed 31-37 days late, and disclosed \$10,392 in contributions.
- 3.33 **March C-3 Reports** - On May 6, 2004, the WCDCC filed 9 C-3 reports late for contributions received in March 2004. These C-3 reports were filed 24 days late, and disclosed \$1,762 in contributions.
- 3.34 **April C-3 Reports** - On May 17 and 21 and June 1, 2, 3, 24 and 25, 2004, the WCDCC filed 32 C-3 reports late for contributions received in April 2004. These C-3 reports were filed 7-46 days late, and disclosed \$10,147 in contributions.
- 3.35 **May C-3 Reports** - On June 2 and 3, 2004, the WCDCC filed 14 C-3 reports for contributions received in May 2004. All of the C-3 reports were timely filed and disclosed \$4,189 in contributions.
- 3.36 **June C-3 Report** - On July 12, 2004, the WCDCC filed 1 C-3 report for contributions received in June 2004. The C-3 was timely filed and disclosed \$12.
- 3.37 **July C-3 Reports** - On July 26 and August 27, 2004, the WCDCC filed three C-3 reports late for contributions received in July 2004. The C-3 reports were filed 8-12 days late, and disclosed \$185 in contributions.



- 3.38 August C-3 Reports** - On August 17, 22 and 30, 2004, the WCDCC filed 19 C-3 reports late for contributions received for August 2004. The C-3 reports were filed 1-9 days late, and disclosed \$2,722 in contributions.
- 3.39 September C-3 Reports** - On September 22, 2004, and October 12, 2004, the WCDCC filed 7 C-3 reports late for contributions received for September. The C-3 reports were filed 2-9 days late, and disclosed \$2,997 in contributions.
- 3.40 October C-3 Reports** - On October 14, 15, and 26, 2004 and November 8, 2004, the WCDCC filed 8 C-3 reports late for contributions received for October. The C-3 reports were filed 1-15 days late, and disclosed \$3,929 in contributions.
- 3.41 November C-3 Reports** - On December 10, 2004, the WCDCC filed 3 C-3 reports late for contributions received in November 2004. The C-3 reports were filed 7-25 days late and disclosed \$89 in contributions.
- 3.42 December C-3 Reports** - On March 9, 2005, the WCDCC filed 5 C-3 reports for contributions received in December 2004. The C-3 reports were filed 59 days late, and disclosed \$1,696 in contributions.

**Calendar Year 2004 Late Filed C-4 Reports (See exhibit 12)**

- 3.43** The following chart summarizes the late filed C-4 reports filed by the WCDCC for 2004:

Month 2004	Due Date	Date Filed	Days Late	Contributions	Expenses
January	2-10-04	4-1-04	51	\$ 2,650	\$ 2,313
February	3-10-04	5-6-04	57	\$ 6,592	\$ 3,620
March	4-12-04	5-7-04	25	\$ 1,806	\$ 1,851
April	5-10-04	6-29-04	50-51	\$ 11,199	\$ 8,999
May	6-10-04	7-1-04	21	\$ 4,189	\$ 4,433
Pre-Primary	8-24-04	9-14-04	21	\$ 8,491	\$ 1,675
Pre -Primary	9-7-04	9-17-04	10	\$ 4,475	\$ 1,235
Pre-General	10-12-04	10-14-04	2	\$ 10,089	\$ 6,361
Post-Election	12-10-04	12-16-04	6	\$ 3,930	\$ 4,421
December	1-10-05	3-15-05	65	\$ 1,832	\$ 6,443
<b>Total</b>			<b>2-65</b>	<b>\$ 55,253</b>	<b>\$ 41,352</b>

**Details of 2004 C-4 Reports**

- 3.44 January C-4 Report** - On April 1, 2004, the WCDCC filed a C-4 report for the month of January 2005. The C-4 report was filed 51 days late, and disclosed \$2,650 in contributions and \$2,313 in expenditures.

- 3.45 **February C-4 Report** - On May 6, 2004, the WCDCC filed a C-4 report for the month of February 2005. The C-4 report was filed 57 days late, and disclosed \$6,592 in contributions and \$3,620 in expenditures.
- 3.46 **March C-4 Report** - On May 7, 2004, the WCDCC filed a C-4 report for the month of March, 2005. The C-4 report was filed 25 days late, and disclosed \$1,806 in contributions and \$1,851 in expenditures.
- 3.47 **April C-4 Report** - On June 29 and 30, 2004, the WCDCC filed three C-4 reports for the month of April, 2005. The C-4 reports were filed 50-51 days late, and disclosed \$11,199 in contributions and \$8,999 in expenditures.
- 3.48 **May C-4 Report** - On July 1, 2004, the WCDCC filed a C-4 report for the month of May 2005. The C-4 report was filed 21 days late, and disclosed \$4,189 in contributions and \$4,433 in expenditures.
- 3.49 **June C-4 Report** - On July 12, 2004, the WCDCC filed a C-4 report for the month of June. The C-4 report was timely filed, and disclosed \$4,141 in expenditures.
- 3.50 **July C-4 Report** - One August 9, 2004, the WCDCC filed a C-4 report for the month of July. The C-4 report was timely filed, and disclosed \$3,755 in expenditures.
- 3.51 **21-day Pre-Primary C-4 Report** - On September 14, 2004, the WCDCC filed a 21-day pre-primary C-4 report that was due August 24, 2004. The C-4 report was filed 21 days late and disclosed \$8,491 in contributions and \$1,675 in expenditures.
- 3.52 **7-day Pre-Primary C-4 Report** - On September 17, 2004, the WCDCC filed a 7-day pre-primary C-4 report that was due September 7, 2004. The C-4 report was filed 10 days late, and disclosed \$4,475 in contributions and \$1,235 in expenditures.
- 3.53 **21-day Pre-General C-4 Report** - On October 14, 2004, the WCDCC filed a 21-day pre-general C-4 report that was due October 12, 2004. The C-4 report was filed 2 days late, and disclosed \$10,089 in contributions and \$6,361 in expenditures.
- 3.54 **7-day Pre-General IC-4 Report** - On October 26, the WCDCC timely filed a 7-day pre-general C-4 report disclosing \$13,110 in expenditures.
- 3.55 **Post Election C-4 Report** - On December 16, the WCDCC filed a post election C-4 report that was due December 10, 2004. The C-4 report was



filed 6 days late, and disclosed \$3,930 in contributions and \$4,421 in expenditures.

- 3.56 **December C-4 Report** - On March 15, 2005, the WCDCC filed a December 2004 C-4 report. The C-4 report was filed 65 days late, and disclosed \$1,832 in contributions and \$6,443 in expenditures.

#### **2004 Distribution of Expenses**

- 3.57 The WCDCC spent \$62,357 in total expenditures in 2004. Based on interview statements by Barry Buchanan, it was determined that \$25,169 in expenditures featured candidates and ballot measures as part of a GOTV, slate card or party-building effort for federal, state and local candidates. There were no monetary or in-kind contributions made to directly support any candidates or ballot measures. The \$62,357 in expenditures were reported on 13 C-4 reports. Of these reports, 10 were filed 2-65 days late. The late filed C-4 reports totaled \$41,352 in expenditures. Of the \$41,352 in expenditures, \$13,128 (32%) were attributed to state or local related campaign expenditures, \$2,965 (7%) were attributed to the U.S. Presidential campaign for John Kerry yard signs and bumper stickers, and \$25,259 (61%) were related to other committee expenses. There were no direct campaign expenditures during 2004.

#### **IV. SCOPE**

- 4.1 PDC staff reviewed the C-1pc report filed by Gene Hogan on January 6, 2005.
- 4.2 Staff reviewed the complaint filed by William McCallum, received on January 3, 2006.
- 4.3 Staff reviewed a phone log, and talked to Mr. Hogan regarding the complaint.
- 4.4 Staff reviewed and analyzed PDC forms C-3, and PDC Form C-4, filed by Gene Hogan during calendar years 2005 and 2004.
- 4.5 Staff reviewed the written response from Barry Buchanan, Chairman of the Whatcom County Democratic Central Committee, received January 26, 2006.
- 4.6 Staff interviewed Barry Buchanan on February 3, 2006.
- 4.7 Staff interviewed Gene Hogan on February 6, 2005

V.  
LAW

- 5.1 RCW 42.17.080 and .090 require candidates to file reports of contributions and expenditures. The reports must be timely, complete, and accurate. A PDC form C-3 must be completed for each bank deposit, and must be filed monthly, except for the four months preceding the election when a C-3 must be filed each Monday. A PDC form C-4, summarizing contributions and expenditures, must be filed monthly, except for special reports due 21 and 7 days before each election. The C-4 report must contain all monetary deposits and expenditures made during the period covered by the report, and must also disclose debts, orders placed and obligations with an estimated or actual value of more than \$250 during the reporting period.

Respectfully submitted this 13<sup>th</sup> day of March, 2006.



Randall R. Unruh  
Senior Political Finance Specialist

**Exhibits**

- Exhibit 1 - PDC Form C1-pc, a Political committee Registration. Shows treasurer, Committee chair and officers of the committee.
- Exhibit 2 – Complaint received by Mr. Bill McCallum. He complained that WCDCC has fallen behind in reporting contributions and expenses.
- Exhibit 3 – Phone log from January 6, 2006, when PDC staff telephoned the WCDCC treasurer Gene Hogan.
- Exhibit 4 – 2005 C-3 reports, listed individually in a spreadsheet showing the date received, due date, days late, and contribution amount (all filed late).
- Exhibit 5 – 2005 C-4 reports, listed individually in a spreadsheet showing the date received, due date, days late, contribution amount, and expenditure amount (all filed late).
- Exhibit 6 – E-mail reply from Barry Buchanan indicating there were no direct campaign expenses in 2005.



Exhibit 7 – Telephone call from Barry Buchanan correcting his e-mail statement. WCDCC did directly support Whatcom County charter amendment one in 2005.

Exhibit 8 – 2005 distribution of expenditures spreadsheet, showing indirect and direct campaign expenses.

Exhibit 9 – Reconciliation of 2005 bank statements and WEDS by Sally Parker, PDC Filer Assistance Specialist.

Exhibit 10 – 2004 late filed C-3 reports, listed individually in a spreadsheet showing the date received, due date, days late, and contribution amount, sorted by month.

Exhibit 11 – 2004 late filed C-3 reports, listed individually in a spreadsheet showing the date received, due date, days late, and contribution amount, sorted by amount.

Exhibit 12 – 2004 late filed C-4 reports, listed individually in a spreadsheet showing the date received, due date, days late, contribution amount, and expenditure amount.